

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION #

JACQUELINE BREINES                     )  
    Plaintiff                                 )  
   )  
VS.   )  
   )  
AMERICAN AIRLINES INC.                )  
    Defendant                                )

**COMPLAINT AND JURY DEMAND**

**THE PARTIES**

1. Plaintiff, Jacqueline Breines is citizen of Newton, County of Middlesex, Commonwealth of Massachusetts.
2. Defendant, American Airlines Incorporated “American Airlines”, is a foreign corporation duly organized under the laws of the State of Delaware, with principal headquarters located at 1 Skyview Drive, MD8B503, Fort Worth, Texas.

**JURISDICTION AND VENUE**

3. The court has subject matter jurisdiction in that there is complete diversity of citizenship based on 28 U.S.C. § 1332. This is a civil action between citizens who are residents of different states, and the amount in controversy exceeds \$75,000, exclusive of interest and costs.
4. Venue is proper pursuant to 28 U.S.C. § 1391 (c) because Defendant is subject to personal jurisdiction in this judicial district for the reasons set forth.

**FACTS**

5. On June 16, 2022, Jacqueline Breines was a passenger on a commercial airliner owned and/or operated by Defendant American Airlines from Oklahoma City to Washington National (DCA).

6. Approximately 45 minutes into the flight, the seat in front of her, in aisle 14, abruptly moved toward her. She brought this to the attention of a flight attendant who confirmed that the seat was broken.

7. About 60 to 75 minutes later, while she was resting her arms and head on the tray table, the seat again suddenly retracted without any notice impacting her head and neck. She was dazed and felt immediate pain.

8. The cause of the incident as described in the previous paragraph was the negligence of Defendant American Airlines in failing to maintain the subject passenger seat in a reasonably safe condition.

9. As a result of the incident described above, Jacqueline Breines suffered and will continue to suffer great pain of body and anguish of mind, she has expended and will continue to expend large sums of money for medical care and attendance, her earning capacity has been and will be impaired, and her ability to enjoy life has been and will be diminished.

**FIRST CAUSE OF ACTION – NEGLIGENCE**  
Jacqueline Breines vs. American Airlines

10. Plaintiff re-alleges and incorporates by reference herein all other allegations in this complaint.

11. Defendant, American Airlines had a duty to maintain their aircraft passenger seats in a reasonably safe manner, but they negligently breached that duty when a passenger seat unexpectedly reclined and injured Plaintiff.

12. As a direct and proximate cause of American Airlines breach of its duty of care, Plaintiff has suffered and will continue to suffer damages, including both economic and non-economic damages in excess of \$75,000.

**DEMANDS FOR RELIEF**

A. Plaintiff Jacqueline Breines demands judgment against American Airlines in the amount of her damages, together with interest and costs as permitted by law, as to the First Cause of Action.

**JURY DEMAND**

Plaintiff demands a trial by jury.

Respectfully submitted,  
The Plaintiff, By her Attorneys

Dated: March 12, 2024

*/s/ Jared J. Muggeo*  
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